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October 25, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: MM Docket 96-16

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Transmitted herewith on behalf of the Texas Association of Broadcasters are an original and four (4) copies of its Reply Comments in the above-referenced proceeding.

Should you or the staff have any questions, kindly contact the undersigned.

Sincerely,


Neal J. Friedman

Enclosures

cc: Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Rachelle B. Chong
Commissioner Susan Ness

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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OCT 25 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Streamlining Broadcast EEO)
Rules and Policies, Vacating the EEO)
Forfeiture Policy Statement)
and Amending Section 1.80 of)
the Commission's Rules To Include)
EEO Forfeiture Guidelines)

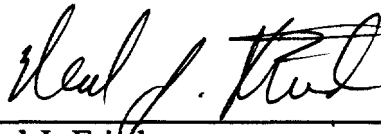
MM Docket No. 96-16

TO: The Federal Communications Commission

REPLY COMMENTS OF THE TEXAS ASSOCIATION OF BROADCASTERS

The Texas Association of Broadcasters hereby submits its Reply Comments in the above-referenced proceeding. Attached hereto is the Declaration of Ann Arnold, Executive Director of the Texas Association of Broadcasters, supplementing Attachment B to the Association's Comments filed on July 11, 1996. The Attachment contains the facsimile signature of Ms. Arnold. An original copy will be submitted to the Commission as soon as it is received.

Respectfully submitted,



Neal J. Friedman

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1776 K Street, N.W., Suite 200
Washington, D.C. 20006
202/296-0600
October 25, 1996

**Texas Association of Broadcasters**

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Ann Arnold, Executive Director

**DECLARATION for
Reply Comments of the Texas Association of Broadcasters**

I, Ann Arnold, declare under penalty of perjury as follows:

I am the Executive Director of the Texas Association of Broadcasters and have held that position since 1987.

Following up on comments filed by the Texas Association of Broadcasters, Attachment B, "The Texas Association of Broadcasters as a Central Recruitment Source," TAB reports its most recent successful effort to recruit a diverse pool of jobseekers for Texas broadcasters.

TAB conducted its broadcaster career fair in conjunction with its annual convention, Sept. 6, 1996, in San Antonio for the second consecutive year. The event drew approximately 1,000 job seekers, including significant numbers of minorities.

The career fair was advertised with public service announcements by radio and television stations across the state with a special focus by stations with large minority audiences.

At least 33 broadcast-related entities representing all parts of Texas hosted booths. Of the 33, three booths were staffed by broadcast owners representing multiple stations. Two booths were staffed by San Antonio and Houston broadcast associations.

All Texas stations have access to the applicants registered with TAB via TAB's web site on the Internet or mail, or for a small fee, by fax. The applicants' resumes also are kept on file available to stations on request.

As part of the 1996 convention, which attracted more than 1,100 registrants, TAB conducted educational sessions for job fair participants. The panels "What Broadcasters Want in Employees" and "Opportunities & Challenges for Minorities in Broadcasting" featured Ernie Jackson, KMIQ Houston; Don Peterson, KHMN Houston; Pluria Marshall, KHRN Hearne; Deborah Duncan, WFAA Dallas and Ron Oliveira, KNVA Austin.

At least 90 percent of one full-time TAB staff person's time is dedicated to its minority recruitment effort. TAB has a staff of five full-time employees.

Additionally, approximately five station representatives, typically owners or general managers, serve on TAB's EEO committee. The EEO committee is charged with reviewing current efforts and devising improved ways to assist stations in securing qualified job applicants and an ethnically diverse pool of qualified employee prospects, educating the general public and future prospects of the myriad career opportunities available in broadcasting, assisting with future FCC pleadings involving the agency's EEO regulations and directing any necessary lobby effort to refine the regulations.

The forgoing is true and correct to the best of my knowledge and belief.

October 25, 1996

By

Ann Arnold
Executive Director